

SHARK**Collection Phase**

From	To
Victoria Moaveni < vmoaveni@aqmd.gov >	Wienke Tax/R9/USEPA/US@EPA
CC	BCC
Philip Fine < pfine@aqmd.gov > Elizabeth Adams/R9/USEPA/US@EPA Doris Lo/R9/USEPA/US@EPA	
Subject	Date/Time
RE: Revised Contingency Measures and RFP for EPA - further clarification	04/03/2012 10:54 AM

Item Body

Hi Wienke:

You are correct. The mass emission limit in Rule 1420.1 only applies to the point sources. However, the additional enclosures are designed for fugitives, and once those are enclosed, it would no longer be a fugitive source, thus subject to the stack limits. The total enclosure requirements are specified in subdivision (e)(2) of Rule 1420.1, which then refers to subdivision (f), thus subject to lead point source emission limits.

(e) Total Enclosures

(2)

Total Enclosure Lead Emissions Control

The owner or operator of a large lead-acid battery recycling facility shall vent stream to a lead control device pursuant to subdivision (f).

I hope this clarifies your questions.

Thanks, Vicki

From: Wienke Tax [<mailto:Tax.Wienke@epamail.epa.gov>]

Sent: Tuesday, April 03, 2012 9:50 AM

To: Victoria Moaveni

Cc: Philip Fine; Elizabeth Adams; Doris Lo; Kara Christenson

Subject: Re: Revised Contingency Measures and RFP for EPA - further clarification

Hi Victoria -

Can you clarify for us where in Rule 1420.1 the requirements for the HEPA filters for the Torit dust collectors are? Are these requirements part of the requirement to meet the mass emission limit? Our understanding was that the mass emission limit in Rule 1420.1 only applied to the point sources, and Exide seems to need to address fugitive emissions even after the emission limit.

thanks much
Wienke

Wienke Tax
EPA Region 9 Air Planning Office
San Francisco, CA ph: 415.947.4192

-----Victoria Moaveni <vmoaveni@aqmd.gov> wrote: -----

To: Wienke Tax/R9/USEPA/US@EPA, Philip Fine <pfine@aqmd.gov>
From: Victoria Moaveni <vmoaveni@aqmd.gov>
Date: 04/03/2012 09:01AM
Subject: Revised Contingency Measures and RFP for EPA - further clarification

Good morning Wienke:

I am sending you this e-mail since Phil is out of the office. He is going to contact you if possible. Wienke, we got a voice message from Elizabeth, and we need further clarification regarding your comments on the RFP section.

As far as RFP demonstration for Exide, we did not give them anything above and beyond what is required in Rule 1420.1 which is already incorporated in the SIP. The HEPA filters, bag-house, and enclosures are part of Rule 1420.1. For future year demonstration, 1420.1 stack limits were used, and the only further reduction given to Exide was for the roadway fugitive emissions, and that is also part of Rule 1420.1 requirements. Please let me know what additional documentation you need, and if I am understanding your comments correctly.

Thanks, Victoria

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